

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

**SEALED**

2008 FEB 13 PM 5:34

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAULO REYES,  
KARINA TARANGO

Defendants.

Cause No. EP-08-CR-

**INDICTMENT**CT 1: 21:963-Conspiracy to Import  
a Controlled Substance;CT 2: 21:952(a)-Importation of a  
Controlled Substance;CT 3: 21:846 & 841(a)(1)-Conspiracy to  
Possess a Controlled Substance with  
Intent to Distribute;CT 4: 21:841(a)(1)-Possession with Intent  
to Distribute a Controlled Substance;  
Notice of Government's Demand for  
Forfeiture.**EP08CR0440****THE GRAND JURY CHARGES:****COUNT ONE**

(21 U.S.C. § 963, 952(a) &amp; 960(a)(1) &amp; 960(b)(2)(G))

That beginning on or about November 27, 2007 and continuing to January 16, 2008, in the

Western District of Texas, the Republic of Mexico and elsewhere, Defendant,

**SAULO REYES,**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to import a controlled substance, which offense involved 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, into the United States from Mexico, contrary to Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(G).

**COUNT TWO**

(21 U.S.C. §§ 952(a), 960(a)(1) & 960(b)(2)(G))

That on or about January 16, 2008, in the Western District of Texas, Defendant,

**SAULO REYES,**

knowingly and intentionally imported into the United States from Mexico a controlled substance, which offense involved 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(G).

**COUNT THREE**

(21 U.S.C. §§ 846 & 841(a)(1) & 841(b)(1)(B)(vii))

That beginning on or about November 27, 2007 and continuing to January 16, 2008, in the Western District of Texas, the Republic of Mexico and elsewhere, Defendants,

**SAULO REYES,  
KARINA TARANGO**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

**COUNT FOUR**  
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)(vii))

That on or about January 16, 2008, in the Western District of Texas, Defendants,

**SAULO REYES,  
KARINA TARANGO**

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
(21 U.S.C. §§ 841, 846 & 963, and 21 U.S.C. § 853)

Upon the conviction on one or more of the offense(s) set forth in Count(s) I, II, III, or IV, Defendant, **SAULO REYES GAMBOA**, shall forfeit to the United States any property constituting, or derived from any proceeds that said defendant obtained directly or indirectly as a result of the said violation(s); any and all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s) of this indictment including but not limited to the following:

1. **CURRENCY**

\$19,250.00 in United States currency, more or less;

2. **CONVEYANCES**

One (1) 2005 Volkswagen Tourareg, Vin #: WVGMM67L55D039879

One (1) 2003 Infiniti FX45, Vin #: JNRBS08W53X00071.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JOHNNY SUTTON  
UNITED STATES ATTORNEY

BY:

  
Assistant U.S. Attorney